

G. TRACY MEHAN III
Director



STATE OF MISSOURI

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY
P.O. Box 176
Jefferson City, MO 65102

March 5, 1992

Division of Energy
Division of Environmental Quality
Division of Geology and Land Survey
Division of Management Services
Division of Parks, Recreation,
and Historic Preservation

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PRMT SECTION

Mr. C. William McGlocklin Director of Environmental Affairs SKF USA, Inc. 1100 First Avenue King of Prussia, PA 19406-1352

Dear Mr. McGlocklin:

A recent review of the financial assurance files for SKF's St. Louis facility (EPA ID# MOT300010345) show that the last submittal of this type was made on March 30, 1987.

It is my understanding that SKF has been attempting to withdraw from interim status for this facility since 1984. However, pursuant to 40 CFR 265 Subpart H as adopted by 10 CSR 25-7.265 of the Missouri Hazardous Waste Management Regulations, the owner/operator of an interim status hazardous waste storage, treatment, or disposal facility is required to maintain financial assurance until certified closure has been completed by an independent registered professional engineer. Until such time, SKF will be required to submit this documentation.

In the past, SKF has used a financial test to demonstrate assurance for closure and a certificate of insurance as liability coverage for sudden accidental occurrences. You are free to continue to use these mechanisms or you may choose to use any of several other instruments available.

Be advised that liability coverage must be in the amount of at least \$1 million per occurrence with an annual aggregate amount of \$2 million exclusive of legal defense costs.

Please submit proof of financial assurance to the Director of the Missouri Department of Natural Resources by April 3, 1992. Feel free to contact me if I can be of any assistance in helping you file the correct forms.

Sincerely,

HAZARDOUS WASTE PROGRAM

Layne Washburn Planner

Layne Washburn, Planner Hazardous Waste Section

LW:js

c: Ms. Rita Huff, EPA Region VII



